



# GGHA PRIVACY POLICY

Updated September 2018

## GGHA PRIVACY POLICY STATEMENT

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The Goulbourn Girls Hockey Association is committed to respecting your Privacy. We recognize that when you choose to provide us with information about yourself, you trust us to act in a responsible manner. That is why we have put a policy in place to protect your personal information. Whenever we wish to release or disclose your information, the reason and scope for the disclosure will be made known to you by completing an Information Release Form that you will sign.

The Goulbourn Girls Hockey Association has one Privacy Policy that applies to four categories of individuals:

- Players
- Parents
- Executive
- Volunteers

This Privacy Policy is based upon the Canadian Standards Association (CSA) Model Code and reflects the requirements of applicable legislation as well.

Whereas the Privacy Policy applies specifically to the four categories of individuals above, it also applies wherever the GGHA collects any personal information about an individual where the personal information is subject to the Privacy Policy or subject to applicable legislation (some personal information, for example, business contact information, is not subject to federal or provincial legislation.)

## DEFINITION OF PERSONAL INFORMATION

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*“Personal information is any information about a specific, identifiable individual, including such commonly available details as name, address, and telephone number.” (CSA Privacy Code)*

Despite the fact that some personal information is widely available (e.g. through telephone directories or public database), this does not, in any way, lessen the responsibility to apply the Code's principles to its collection, use and disclosure. The CSA Code incorporates the principles that every element of personal information should only be used for purposes that are defined and explained in advance to the individual, and that use or disclosure for any other purposes requires further knowledge and consent.

## POLICY

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We respect your privacy. When you visit our web site, contact us, participate in one of our programs, become a member, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

In order to do so, the Goulbourn Girls Hockey Association has adopted the 10 Privacy Principles contained within the Canadian Standards Association Model Code for the Protection of Personal Information, which is a national standard of Canada. We have also taken steps to become compliant with applicable laws in Canada that protect personal information.

## OUR 10 PRIVACY PRINCIPLES

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### 1. Our responsibility to protect your personal information

The Goulbourn Girls Hockey Association is responsible for the protection of your personal information collected through its national, regional, and branch offices, or program activities. This responsibility extends when personal information is transferred to or collected by third parties on our behalf.

### 2. Our obligation to identify the purposes for collecting personal information

Before we collect any personal information from you, we will identify the purpose for the collection. A statement of purposes will be communicated wherever possible.

### 3. The requirement for knowledge and consent

We will only collect personal information with your knowledge and consent, except in limited situations as permitted by law. This may be with your express consent (for example, where you voluntarily provide information on a form for purposes you clearly understand and agree to) or by declining an opportunity to opt-out of our collection or use of your personal information.

Opt-out consent will be used only for non-sensitive information where we believe that the privacy impacts are low, and you will be provided with sufficient notice of your right to opt-out of such uses.

Further, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice. <sup>(1)</sup>

*A decision to withhold some personal information may influence the ability of the Goulbourn Girls Hockey Association or its affiliates to provide you with services*

### 4. Limiting information collection

We only collect personal information relevant to the purposes that have been identified. We collect information fairly and lawfully, and directly from individuals wherever possible. <sup>(1)(2)</sup>

You have the right to provide as much, or as little personal information as you choose to share

*If you provide information about a family medical history, this information will be considered as your information only, and not personal information of other family members.*

*Fund-raising lists may be obtained from third parties.*

5. Limiting Use, Disclosure and Retention of your information

We only use or disclose your personal information for the purposes we have identified to you.

6. Our responsibility to ensure the accuracy of your personal information

Other than fund-raising lists, virtually all of the personal information that we collect comes directly from individuals themselves, for example on our membership application forms. We generally assume this information to be accurate and complete, unless we are informed otherwise.

7. Our responsibility to safeguard your personal information

The Goulbourn Girls Hockey Association uses appropriate safeguards to protect all personal information in its custody and control.

8. Our obligation to be open about our Privacy Policy and practices

We are open about our policies and procedures. We make reasonable efforts to inform individuals about our policies and procedures, the purposes for which we collect, use or disclose personal information, and how to access your personal information.

9. Your right to access your personal information

Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used or disclosed\*. You have a right to update any personal information that we hold on you. Should you wish to see the full contents of an information file, you must make a formal written request to our Privacy Officer.

*\* With donor consent and stringent controls, we share donor contact information, only with other charities with similar aims and objectives. These sharing arrangements help the Goulbourn Girls Hockey Association increase its fund-raising through an expanded donor base.*

10. Your right to challenge our compliance with our Privacy Policy

If, for any reason, you are concerned about our compliance with our Privacy Policy, please contact our Privacy Officer. Please provide us with all of the information below so we will have the best chance of finding your membership record in our database:

**Players First Name**  
**Last Name**  
**Birth Date**  
**Address**  
**Home Phone Number**

### WHAT INFORMATION DOES GGHA COLLECT?

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At times, we may request that you supply us with personal information. Information may be requested and/or required:

- When you register, we require your name, your birth date, the players name, player's birth date, Ontario Minor Hockey Member ID, e-mail address, residence address, telephone number, hockey position preference, and hockey playing history. This information is required for insurance and legal purposes.
- When you are attending an Association game, activity or event, we may ask for your name, the player's name, player's number, coaching credentials, address, telephone number and e-mail address so we can administer the event, submit results, summaries and or details to newspapers or the Association website, and notification to our members. There is also certain statistical data on player performance that will be collected and made available.
- By the Goulbourn Girls Hockey Association, the Ontario Women's Hockey Association, the Ontario Hockey Federation, Hockey Canada and all affiliated associations providing games, activities or events to:

Operate our Association, our web site and/or effect maintain and administer memberships to create teams, tournaments, games, activities, events, newsletters, create and share reports amongst the membership; and

Perform screening services between you and us and/or others.

To collect and retain aggregate statistics about our members, activities, web traffic patterns, and related site information. Additional statistics will also be collected on issued of Association concern such as injuries, conduct violations and training but all these statistics will not include any personal identifying information.

## PROTECTING MEMBERSHIP INFORMATION

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When you visit our websites, we will not collect your personal information unless you choose to use and receive online products and services that require it. For transactions with our organization involving credit cards, our online systems use up-to-date security protocols to ensure the integrity and confidentiality of your information.

Furthermore, we take steps to protect the membership data we collect from unauthorized access, disclosure, alteration, or destruction through the use of passwords and restricted access to those authorized individuals that require the information to conduct Association business. Additionally, access will be limited to that information required for the conduct of their Association function to further protect your privacy.

## DISCLOSING INFORMATION TO OUTSIDE PARTIES

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Without the express approval of the elected officers, no mailing lists containing any personal information shall be provided to anyone in or out of the Association. The mailing list of the Association is the sole proprietorship of GGHA and shall be used only for conducting the business of the Association. Goulbourn Girls Hockey Association may store and disclose personal information as allowed or required by the applicable law, including making disclosures that are necessary or advisable to:

- a. Protect the rights, safety or property of users of our web site, the members, the public, or Goulbourn Girls Hockey Association or our web site suppliers; and
- b. Conform to legal or regulatory requirements.

Because Goulbourn Girls Hockey Association operates with governing bodies, we make information we gather available to these governing bodies. For those visiting outside the Ontario Women's Hockey Association, please note that Goulbourn Girls Hockey Association and its affiliates will make the personal data you enter for use for any of the purposes described above.

### [Important Notice](#). ***Links to other sites and advertisements***

GGHA's website contains links to other websites and services. While we try to link only to sites and services that share our high standards and respect for privacy, please understand that we are not responsible for the content of, or the privacy practices employed by, other companies or websites. We provide these links solely for your information and convenience. When you link to an outside website, you are leaving a Goulbourn Girls Hockey Association Web site and our information management policies no longer apply.

## CONSENT TO DISCLOSE YOUR INFORMATION

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By using our web site and providing us with your personal data, you consent to the collection and use of this information by the Goulbourn Girls Hockey Association.

Where we want to post specific information for promotional and public awareness purposes, members will be requested to complete an appropriate Information Release Form. In most cases this will be limited to the posting of a player's name, hockey statistics and appropriate hockey image. Special events and other events where more particular information might be released should be coordinated with the Association Privacy Officer and the Association VP Admin before posting.

## CHANGES TO OUR POLICY

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If we decide to change our Privacy practices, we will post those changes on this page so that you are always kept informed of what data we collect, how we use it, and under what circumstances we disclose it. Please check this page for changes from time to time to make sure you are aware of our latest Privacy practices.

Our goal is to respect your Privacy. If you have any questions or would rather we not post information about you or your registered child (player) in Goulbourn Girls Hockey Association, please tell us by contacting the Privacy Officer.

## INFORMATION RELEASE CONSENT

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In accordance with our Privacy Policy, we will seek consent before making information available outside the needs to conduct Association business.

If a need to release information is identified, you will be asked to complete a consent form to release information. Before doing so, ensure that the type of information and purpose of use is clearly articulated on the form, or attached to it.

Should the specifics of the consent not be covered by the form, the back of the form or a separate piece of paper may be used to articulate the information and purpose for which consent is being given.

This consent form remains effective until the end of the Hockey season (1 June) each year or when consent is withdrawn in writing to the Privacy Officer, whichever occurs first.